

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

INGENIADOR, LLC,

Plaintiff,

v.

ALFRESCO SOFTWARE, INC.;
INTERWOVEN, INC; BLACKBOARD,
INC.; BRIDGELINE DIGITAL, Inc.;
EMC CORPORATION; HEWLETT-
PACKARD COMPANY; INFORMATICA
CORPORATION; COMPULINK
MANAGEMENT CENTER, INC.;
LEXMARK INTERNATIONAL, INC.;
MICROSOFT CORPORATION; NUXEO
CORPORATION; OBJECTIVE
CORPORATION USA, INC.; ORACLE
CORPORATION; SAP AMERICA, INC.;
SDL TRIDION, INC.; AND SPRINGCM
INC.

Defendants.

Civil Action No. 3:11-cv-01840-GAG

DECLARATION OF CLARITZA DE LEÓN-MARRERO
UNDER PENALTY OF PERJURY

Pursuant to 28 U.S.C. § 1746, I, Claritza De León-Marrero, declare under penalty of perjury as follows:

1. I am a paralegal with O'Neill & Borges, a law firm that has appeared as local counsel of record for EMC Corporation ("EMC") in the above-captioned action. I submit this declaration in support of EMC Corporation's Motion To Dismiss For Improper Joinder or, in the Alternative, to Sever and Transfer Claims to the United States District Court for the Northern District Of California, filed concurrently herewith. Except as to matters specifically stated to be on information and belief, I have personal knowledge of the facts set

forth in this declaration and, if called to testify as a witness, could and would do so competently.

2. On October 17, 2011 I personally went to the building located at 1607 Calle Colón #101, San Juan, PR. Upon my arrival, I asked a man who was parking his car in front of the building whether he lived in that building. He responded that he lived in the condominium next door. I asked him whether he knew if the building located at 1607 Calle Colón #101, San Juan, PR was a commercial or a residential building. He responded that, to the best of his knowledge, the building was residential, and he did not know of any offices located inside the building. I noticed that there were no signs on the building indicating any sort of commercial activity.

3. On October 21, 2011 I returned to the same address and took photographs of the building's exterior. Attached hereto as Exhibit A are copies of a series of photographs that I took of the exterior of the building located at 1607 Calle Colón #101, San Juan, PR.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on November 2, 2011 in San Juan, Puerto Rico.

By


Claritza De León-Marrero





